UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

COALITION TO MARCH ON THE RNC,

Plaintiff.

v.

Civil Action No: 2:24-cv-00704

CITY OF MILWAUKEE, CAVALIER
JOHNSON in his official capacity as Mayor of
the City of Milwaukee, JERREL KRUSCHKE
in his official capacity as Commissioner of
Public Works for the City of Milwaukee, and
KIMBERLY A. CHEATLE in her official
capacity as Director of the United States
Secret Service,

Defendants.

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR ATTORNEY FEES AND BILL OF COSTS PURSUANT TO RULE 54

Plaintiff in the above styled case files this motion pursuant to Federal Rule of Civil Procedure 6(b) requesting that the Court extend the deadline for Plaintiff to file its Motion for Attorney Fees and Bill of Costs by 14 days.

The Court entered final judgment in this case on July 11, 2024 ordering a permanent injunction as to the City Defendants. As a prevailing party pursuant to the Court's judgment, Plaintiff intends to move the Court to award attorney fees and costs pursuant to 42 U.S.C § 1988 as alleged in its First Amended Complaint (ECF 33 at 23) as to the City Defendants. Pursuant to Rule 54, Plaintiff's current deadline to file its motion for attorney fees, bill of costs, and supporting documents is July 25, 2024. Due to the extremely expedited nature of this case, the intervening Republican National Convention that was the subject of this case, and in order to explore

opportunities to reach an agreement among the parties on the issues involved in a motion for fees

and costs, Plaintiff requests that the Court extend this deadline by 14 days, until August 8, 2024.

Good cause exists to grant this motion due to the short timeline in which this case has

progressed making strict compliance with Rule 54 difficult, and the possibility that an extension

of time may save judicial resources if the parties are able to reach an agreement as to the issues

that would be the subject of Plaintiff's motion.

Plaintiff's counsel attempted to confer with counsel for the City Defendants regarding this

motion on the morning of July 24, 2024, but did not immediately receive a response as to whether

or not this motion was opposed.

Dated: July 24, 2024

Respectfully submitted,

By: /s Hayley I. Archer

RYAN V. COX

Bar No. 24074087

rcox@aclu-wi.org

R. TIMOTHY MUTH

Bar No. 1010710

tmuth@aclu-wi.org

HAYLEY I. ARCHER

Bar No. 1101459

harcher@aclu-wi.org

ACLU OF WISCONSIN FOUNDATION

207 E. Buffalo Street, Suite 325

Milwaukee, WI 53202

Phone: 414-272-4032

Attorneys for Plaintiff, Coalition to March on the RNC

2